

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF ORANGE

ORAL CLARKE, ROMANCE REED, GRACE  
PEREZ, PETER RAMON, ERNEST TIRADO, and  
DOROTHY FLOURNOY

Plaintiffs,

- against -

TOWN OF NEWBURGH and TOWN BOARD OF  
THE TOWN OF NEWBURGH,

Defendants.

Index No. EF002460/2024

**NOTICE OF MOTION IN  
LIMINE**

**PLEASE TAKE NOTICE** that upon the Affirmation of Amy Marion, dated May 5, 2025, the exhibit annexed thereto, and upon all pleadings and proceedings had herein, Plaintiffs, by their undersigned attorneys, will move this Court at the Supreme Court of the State of New York, Orange County, 285 Main Street, Goshen, New York, on the 12th day of May, 2025, at 10:00 a.m., or as soon thereafter as counsel can be heard for an order:

- 1) Precluding Defendant’s expert witness, Brad Lockerbie, from offering opinion testimony as to “legal requirements”; and
- 2) For such other and further relief as this Court deems just and necessary.

Dated: Brooklyn, NY  
May 5, 2025

ABRAMS FENSTERMAN, LLP



By: \_\_\_\_\_

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To: All counsel OF RECORD via NYSCEF